

## **MODULE III - CONTAINERS**

### **III.A. APPLICABILITY**

- III.A.1. This module shall regulate storage of hazardous waste in containers at U.S. Army Dugway Proving Ground. The Permittee shall comply with R315-8-9 of the rules and all conditions of this Module.
- III.A.2. The designated hazardous waste storage areas at the Central Hazardous Waste Storage Facility (CHWSF) are the sixteen bays and five chemical storage cabinets in the Container Storage Building.
- III.A.3. The designated hazardous waste storage area at Igloo G (Carr Facility Building 3643) is the interior of the twenty-five feet wide and eighty feet long building. There will be sand filled barriers placed between the hazardous waste and any non-waste material that is also stored in Igloo G.

### **III.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION**

- III.B.1. The Permittee may store the following hazardous wastes codes, listed by the State of Utah, in containers at the CHWSF subject to the terms of this Permit:

D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D012, D013, D014, D015, D016, D017, D018, D019, D020, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043

F001, F002, F003, F004, F005, F027, F999

P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, P033, P034, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P054, P056, P057, P058, P059, P060, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P077, P078, P081, P082, P084, P085, P087, P088, P089, P092, P093, P094, P095, P096, P097, P098, P099, P101, P102, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P118, P119, P120, P121, P122, P123, P999

U001, U002, U003, U004, U005, U006, U007, U008, U009, U010, U011, U012, U014, U015, U016, U017, U018, U019, U020, U021, U022, U023, U024, U025, U026, U027, U028, U029, U030, U031, U032, U033, U034, U035, U036, U037, U038, U039, U041, U042, U043, U044, U045, U046, U047, U048, U049, U050, U051, U052, U053, U055, U056, U057, U058, U059, U060, U061, U062, U063, U064, U066, U067, U068, U069, U070, U071, U072, U073, U074, U075, U076, U077, U078, U079, U080, U081, U082, U083, U084, U085, U086, U087, U088, U089, U090, U091, U092, U093, U094, U095, U096, U097, U098, U099, U101, U102, U103, U105, U106, U107, U108, U109, U110, U111, U112, U113, U114, U115, U116, U117, U118, U119, U120, U121, U122, U123, U124, U125, U126, U127, U128, U129, U130, U131, U132, U133, U134, U135, U136, U137, U138, U140, U141, U142, U143, U144, U145, U146, U147, U148, U149, U150, U151, U152, U153, U154, U155, U156, U157, U158, U159, U160, U161, U162, U163,

U164, U165, U166, U167, U168, U169, U170, U171, U172, U173, U174, U176, U177, U178, U179, U180, U181, U182, U183, U184, U185, U186, U187, U188, U189, U190, U191, U192, U193, U194, U196, U197, U200, U201, U202, U203, U204, U205, U206, U207, U208, U209, U210, U211, U213, U214, U215, U216, U217, U218, U219, U220, U221, U222, U223, U225, U226, U227, U228, U234, U235, U236, U237, U238, U239, U240, U243, U244, U246, U247, U248, U249, U328, U353, U359

- III.B.2. The Permittee may store hazardous waste with the codes D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D021, D028, D030, D034, D039, D040, F999, P033, P095, P999, and U125 in Igloo G.
- III.B.3. The Permittee shall be prohibited from storing hazardous waste that is not identified in Condition(s) III.B.1 and III.B.2. Addition of hazardous waste codes to Condition(s) III.B.1 and III.B.2 of this permit requires modification of the permit as required by R315-3-4.3 of the rules.
- III.B.4. Prohibited Wastes. The Permittee shall be prohibited from storing compressed gas cylinders and mixed waste, and the Permittee shall be prohibited from storing explosives and pure “neat” dilute, and off specification chemical agent that has not been detoxified at the CHWSF.

### **III.C. CONDITION OF CONTAINERS**

- III.C.1. If a container holding hazardous waste at the CHWSF is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste, or the container itself, to a Department of Transportation (DOT) approved container in accordance with Attachment 1-9, as soon as possible but not later than twenty-four hours from the time the problem was discovered. The Permittee must also follow the plans in Attachment 1-9, for spill prevention and cleanup.
- III.C.2. If an overpack or container holding hazardous waste or a range recovered munition in Igloo G is not in good condition or if it begins to leak, the Permittee shall transfer that overpack or container and hazardous waste or range recovered munition to a larger overpack or otherwise contain a release as soon as safely possible after discovery of a leaking overpack as described in Attachment 2-9. The Permittee must also follow the plans in Attachments 2-7 and 2-9 for spill prevention and clean up in Igloo G.

### **III.D. COMPATIBILITY OF WASTE WITH CONTAINERS**

- III.D.1. The Permittee shall assure that the waste is compatible with the containers as required by R315-8-9.3 of the rules. The types of containers to be used for storage are listed in Attachment 1-9, Exhibit 2-3.
- III.D.2. The Permittee must safely segregate incompatible wastes. Guidance in determining compatibility of wastes can be found in “A Method for Determining the Compatibility of Hazardous Wastes” (EPA-600/2-80-076). Compatibility of Hazardous Waste is referenced in Attachment 1-9, Section 2.1 Description of Containers and 2.2 Drum Handling.

### **III.E. MANAGEMENT OF CONTAINERS**

III.E.1. At the CHWSF, the Permittee shall keep all containers closed during storage, except when it is necessary to add or remove waste, and shall not open, handle, or store containers in a manner, which may rupture the container or cause it to leak R315-8-9.4 of the rules. The Permittee shall under no circumstances open the range-recovered munitions (RRM) stored in Igloo G unless placed under engineering controls.

III.E.1 The Permittee shall manage containers as specified in Attachments 1-9 and 2-9.

III.E.2 At the CHWSF-the Permittee shall store all containers on pallets and shall not stack containers in any bay more than two containers high. The Permittee may use shelving for storage of containers. The Permittee shall store containers in the storage cabinets as specified in Attachment 1-9 of this permit and shall not exceed the storage specifications of each cabinet.

III.E.3 The Permittee shall comply with R315-13-1 of the rules for proper storage of wastes under the land disposal restrictions. The Permittee shall record in the operating record any wastes prohibited from storage that are stored for a period of time exceeding one year. Justification for storage of prohibited wastes beyond one year must be included in the operating record.

**III.F. CONTAINMENT SYSTEMS**

The Permittee shall maintain the containment system in accordance with the attached plans and specifications, contained in Attachments 1-9, 2-9, and the facility drawings in Attachments 1-5 and 2-5, and as specified in R315-8-9.6.of the rules.

III.F.1 The Permittee shall use the container management areas and the Permittee shall use the stacking configurations as shown on the drawings listed below:

III.F.1.a. The facility drawings in Attachment 1-5 present the details of construction of the CHWSF. Attachment 1-9 presents container-stacking configurations for the CHWSF.

III.F.1.b Attachment 1-9 presents container-stacking configurations for CHWSF.

III.F.1.c. Attachment 2-9 presents storage procedures for Igloo G.

III.F.1.d At capacity, the Permittee may store the following volumes of wastes:

III.F.1.d.1. CHWSF - twenty four thousand, six hundred and forty (24,640) gallons in the sixteen (16 bays) and two hundred forty (240) gallons in the five chemical storage cabinets with a total capacity of twenty four thousand, eight hundred and eighty (24,880) gallons.

III.F.I.d.2 Igloo G - four million, one hundred sixty thousand (4,160,000) pounds of range recovered munitions, which includes the actual weight of munition casings and their contents. Munitions stored will be separated from other non-waste materials stored in Igloo G and all areas used for waste management will be clearly marked.

III.F.2 Container management areas (the location of the sumps in the CHWSF are shown in the facility drawings in Attachment 1-5) shall be inspected for the presence of free liquids in accordance with Attachments 1-3 and 1-9. If liquids are discovered in the sumps or other containment area, the Permittee shall record the location of the release in the inspection log. Any liquids discovered shall be removed and managed according to the spill contingency plan outlined in Attachment 1-7.

III.F.3 For purposes of inspections, all containers stored in the liquid hazardous waste storage area shall be considered full to their respective capacities with liquid hazardous waste.

**III.G. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE**

III.G.1. The Permittee shall not locate containers holding ignitable or reactive waste within fifteen (15) meters (fifty (50) feet) of the Facility boundary (as required by R315-8-9.7 of the rules).

III.G.2. The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and follow the procedures specified in Attachments 1-9 and R315-8-2.8(a). of the rules.

**III.H. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE**

III.H.1. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material as specified in R315-8-9.8(a). or the rules.

III.H.2. The Permittee shall not place incompatible wastes, or incompatible wastes and materials, as specified in R315-8-9.8 (b) of the rules, in a container unless the container is washed, or the container is empty and is fitted with a disposable liner.

III.H.3 Where wastes are placed into a container not fitted with a disposal liner and the container previously held an incompatible waste or material, the Permittee must document compliance with Condition III.H.2, as required by R315-8-2-8.(c) of the rules and must place this documentation in the operating records.

**III.I. IDENTIFICATION OF LOCATION OF CONTAINERS IN THE OPERATING RECORD**

III.I.1. The Permittee shall record, in the operating log, the location of each container accepted in the container storage areas and Igloo G. The location records shall be maintained until a container is either removed for processing, or manifested off-site. The Permittee shall follow the plan for tracking of waste at the CHWSF as presented in the CHWSF part of Attachment 1-9, Section 2.2. The Permittee shall follow the plan for tracking of range-recovered munitions stored in Igloo G as presented in Attachment 2-9.

III.I.1 The Permittee shall follow the plans in Attachments 1-9 and 2-9 for identification and labeling of containers.

**III.J. MAINTENANCE OF THE CONTAINER MANAGEMENT AREA**

- III.J.1. The Permittee shall maintain the container management areas in accordance with the details located in the drawings for the CHWSF and Igloo G provided in Attachments 1-9, 2-9, and the drawings in Attachments 1-5 and 2-5.

**III.K. INSPECTION SCHEDULES AND PROCEDURES**

- III.K.1. The Permittee shall inspect the container storage areas at the CHWSF and Igloo G weekly, as specified by R315-8-9.5 as required by R315-8-2.6. of the rules. The purpose of this inspection shall be to detect leaking containers, for deterioration of containers, and to detect deterioration of the secondary containment system caused by corrosion and other factors as specified in R315-8-9.5. of the rules.
- III.K.2. If problems are observed during the inspections described in Condition II.L.1 of this permit, the Permittee must correct the problem as specified in R315-8-2.6(c) and (d) of the rules and Attachments 1-9 and 2-9.
- III.K.3. When loading and unloading activities are occurring, the container storage area shall be inspected daily. The Permittee shall document inspections.

**III.L. RECORDKEEPING**

- III.L.1. The Permittee shall place the results of all waste analyses and trial tests and any other documentation showing compliance with the requirements of Condition III.K. and R315-8-9.8 and R315-8-2.8(b) of the rules in the facility operating records as specified in R315-8-5.3. of the rules. The Permittee shall maintain compliance with Condition II.E as it provides the basis for correcting problems identified during inspections of container management areas.

**III.M. CLOSURE**

- III.M.1. At closure of any container area, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures in the Closure and Post Closure Plan, Attachments 1-8 and 2-8 and as specified in R315-8-7 and R315-8-9.9. of the rules.

**III.N. OTHER CONDITIONS**

**III.N.1 SUBPART BB and SUBPART CC**

The Permittee may apply for an exemption from the air emission requirements of R315-8-18 (Subpart BB) and R315-8-22 (Subpart CC) of the rules as indicated in Permit Condition II.C.7. However, if operations or procedures change so as to render applicable waste management unit(s) subject to Subparts BB and CC standards, a modification request must be submitted to include Subparts BB and CC compliance plans. The CHWSF is currently subject to the interim Subpart BB and CC requirements until permit reissuance.